



Reply to
Attention of:

DEPARTMENT OF THE ARMY
MEMPHIS DISTRICT CORPS OF ENGINEERS
167 NORTH MAIN STREET B-202
MEMPHIS TN 38103-1894

October 12, 1999

Planning, Programs and Project Management Division
Project Management Branch

Mr. Allan J. Mueller
Field Supervisor, Arkansas Field Office
U.S. Fish and Wildlife Service
1500 Museum Road, Suite 105
Conway, Arkansas 72032

Mr. William B. Hathaway
U.S. Environmental Protection Agency
Region 6, Director,
Water Quality Protection Division

Dear Sirs:

This is in response to your letter of September 7, 1999, in which you requested that we evaluate a proposal, developed by Mr. Jerry Lee Bogard, presented in the "Agricultural and Industrial Partnership for the Preservation of Arkansas Groundwater".

The only new idea is the proposal from International Paper. The U.S. Fish and Wildlife Service has participated in the Eastern Arkansas Regional Comprehensive Study and the Grand Prairie Area Demonstration Project since 1982. During the study period, the relative merits of various conservation measures were fully considered. The conservation features have been fully optimized and included in the Grand Prairie Area Demonstration Project. The studies concluded that conservation features alone could not provide for protection of the Sparta and alluvial aquifers, prevent great losses to the area's economy, or provide the many environmental benefits included in the recommended plan. All potential sources of excess surface water were considered. Areas better served by the Arkansas River were included in the Bayou Meto study area, and the area south of DeWitt, Arkansas, was later removed from the project area when studies indicated that this area could better be served from the Arkansas River. Multiple withdrawal points were also considered on the White River, but not recommended because of engineering and environmental considerations.

International Paper switching to surface water would only effect the Sparta aquifer. The Grand Prairie report stated that this aquifer, because of its purity but relatively low safe yield, should be used for municipal and industrial supply and not used for agricultural irrigation water. A cone of depression is developing in the Stuttgart area separate from the cone at Pine Bluff due primarily to use of the Sparta for irrigated agriculture. In addition, recent observed well data shows that the depletion of the Sparta is occurring rapidly as the alluvial is depleted and more farmers are turning to the Sparta with greater and greater water demands. This clearly shows the need for rapid construction of the Grand Prairie Area

Demonstration Project to protect both the Sparta and alluvial aquifers. International Paper's use of the Sparta likely has minimal effect on the Sparta in Grand Prairie area compared to irrigated agriculture and no effect on the alluvial aquifer. However, this portion of the proposal appears to have merit for aquifer protection and may be considered in the study of the Bayou Meto Basin, which is located adjacent to Pine Bluff and would likely rely on the Arkansas River for excess water, or in the study of additional features for ground water protection and the environment for the Grand Prairie. Regardless, International Paper switching from the Sparta aquifer to using Arkansas River water would have no effect on the formulation and optimization of the recommended plan for the Grand Prairie.

Mr. Bogard's plan includes the transfer of \$50 million in Federal funding to an irrigation district that has yet to be formed. The Corps has no authority for this transfer.

I agree that careful and complete consideration should be given to all serious proposals. I have carefully and completely considered Mr. Bogard's proposals. These proposals represent relatively minor deviations from plans previously analyzed and used in the formulation and optimization of the recommended plan. Mr. Bogard's proposals have been considered and found that they do not warrant additional development under this project.

I invite you to meet with members of my staff either in our offices or in the project area to review the planning process that your agency participated in and the plans that we together formulated and evaluated. Please contact Jim Bodron of my staff, the Project Manager, at 901-544-3639 for additional information.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Dan WK' followed by a horizontal flourish.

Daniel W. Krueger
Corps of Engineers
District Engineer

Copies Furnished:

Mr. Sam Hamilton, RD, FWS, Atlanta GA
Mr. Greg Cook, RA, EPA, Dallas, TX
Arkansas Soil and Water Conservation Commission
White River Irrigation Water Distribution District